

EXHIBIT 4



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September 7, 2005

BY E-MAIL AND VERILAW

Tim Terry
Deputy Attorney General
Office of the Attorney General
198 North Carson Street
Carson City, NV 89701

Jeniphr A. Breckenridge
Hagens Berman Sobol Shapiro
1301 Fifth Avenue
Suite 2900
Seattle, WA 98101

Re: Nevada AWP Actions

Dear Tim & Jeniphr:

I am writing to follow-up on my letter of August 30, 2005. We wish to clarify that Defendants request that the State search for and produce responsive documents held by all State agencies and entities, not just Nevada Medicaid. Defendants' discovery requests of May 3, 2005, make clear that Defendants are seeking documents from "any state office, agency, or body." In particular, we request that the State search for and produce any responsive documents held by the following State entities:

- Nevada Public Employees Benefits Program
- Nevada Department of Administration, Purchasing Division
- Nevada Department of Mental Health and Developmental Services
- Lakes Crossing Center



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- Northern Nevada Adult Mental Health Services
- Rural Clinics Community Mental Health Centers
- Southern Nevada Adult Mental Health Service
- University and Community College System of Nevada
- Nevada Budget Office

Please contact me at (202) 662-5404 at your earliest convenience to make arrangements for a meet-and-confer conference to discuss these issues and those raised in my August 30, 2005, letter. In my absence, please contact my colleague, Ron Dove, at (202) 662-5685, rdove@cov.com.

With best regards,



Jason R. Litow

cc: Counsel of record (by Verilaw)